

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ROME DIVISION**

Coosa River Basin Initiative;  
Raymond J. Perkins, Jr., and J. Perkins  
Farms, LLC

Plaintiffs,

v.

3M Company; EIDP, Inc. f/k/a E.I.  
DuPont de Nemours and Company;  
The Chemours Company; Corteva,  
Inc.; INV Performance Surfaces, LLC;  
Daikin America, Inc.; Shaw Industries,  
Inc.; Shaw Industries Group, Inc.;  
Aladdin Manufacturing Corporation;  
Mohawk Industries, Inc.; Mohawk  
Industries, LLC; The City of Dalton,  
Georgia, acting through its Board of  
Water, Light and Sinking Fund  
Commissioners d/b/a Dalton Utilities,

Defendants.

Civil Action No. 4:25-cv-00075-AT

**DEFENDANT THE CITY OF DALTON, GEORGIA,**  
**ACTING THROUGH ITS BOARD OF WATER, LIGHT, AND**  
**SINKING FUND COMMISSIONERS, D/B/A DALTON UTILITIES'**  
**CERTIFICATE OF INTERESTED PERSONS AND**  
**CORPORATE DISCLOSURE STATEMENT**

Pursuant to Local Rule 3.3, Defendant the City of Dalton, Georgia, acting through its Board of Water, Light, and Sinking Fund Commissioners, d/b/a Dalton Utilities ("Dalton Utilities") hereby states as follows:

- (1) The undersigned counsel of record for a party or proposed intervenor to this action certifies that the following is a full and complete list of all parties, including proposed intervenors, in this action, including any parent corporation and any publicly held corporation that owns 10% or more of the stock of a party or proposed intervenor:

Defendant Dalton Utilities is a municipality; it has no parent company, and no publicly held company owns 10% or more of its stock.

The other Defendants are: 3M Company, EIDP, Inc. (f/k/a E.I. DuPont de Nemours and Company), The Chemours Company, Corteva, Inc., DuPont De Nemours, Inc., INV Performance Surfaces, LLC, Daikin America, Inc., Shaw Industries, Inc., Shaw Industries Group, Inc., Aladdin Manufacturing Corporation, Mohawk Industries, LLC, and Mohawk Industries, Inc. Dalton Utilities lacks knowledge or information sufficient to indicate whether any other defendant or Plaintiffs have a parent corporation and whether any publicly held corporation owns 10% or more of the stock of any defendant.

- (2) The undersigned further certifies that the following is a full and complete list of all other persons, associations, firms, partnerships, or corporations having either a financial interest in or other interest which could be substantially affected by the outcome of this particular case:

None.

- (3) The undersigned further certifies that the following is a full and complete list of all persons serving as attorneys for the parties, including proposed intervenors, in this case:

**Counsel for Dalton Utilities:**

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Dalton Utilities lacks sufficient information to identify the attorneys for other Defendants.

Respectfully submitted, this 27th day of May 2025.

**TROUTMAN PEPPER LOCKE LLP**

*/s/ Lindsey B. Mann*

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**Counsel for Defendant The City of  
Dalton, Georgia, acting through its  
Board of Water, Light and Sinking  
Fund Commissioners, d/b/a Dalton  
Utilities**

**CERTIFICATE OF COMPLIANCE**

Pursuant to Local Rule 7.1(D) of the Local Rules for the United States District Court for the Northern District of Georgia, I hereby certify that the foregoing has been prepared in Times New Roman, 14-point font, as permitted by Local Rule 5.1.

This 27th day of May, 2025.

/s/ Lindsey B. Mann

Lindsey B. Mann

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Georgia Bar No. 431819

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing was electronically filed with the Clerk of Court using the CM/ECF system, which automatically serves notification of such filing to all counsel of record.

This 27th day of May, 2025.

/s/ Lindsey B. Mann

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